

IN THE UNITED STATES DISTRICT COURT  
FOR THE PENNSYLVANIA DISTRICT OF PENNSYLVANIA

TANIELLE SHURNEY,

Plaintiff,

Civil Action No. 05-196 Erie

vs.

SCOTT'S ECONO INN, INC.  
SCOTT'S SPLASH LAGOON, INC.

SEAN PIERCE, INDIVIDUALLY AND IN  
HIS CAPACITY AS A TROOPER OF THE  
PENNSYLVANIA STATE POLICE

JOHN DOE, INDIVIDUALLY AND IN HIS  
CAPACITY AS THE SUPERVISOR OF THE  
PENNSYLVANIA STATE POLICE,

Defendants.

DEFENDANT'S, SCOTT'S ECONO INN, INC., INTERROGATORIES AND  
REQUEST FOR PRODCUTION OF DCOUMENTS DIRECTED TO THE PLAINTIFF

Defendant, Scott's Econo Inn Inc., hereby make demand that the plaintiff answer the following Interrogatories under oath. These Interrogatories shall be deemed continuing, so as to require supplemental answers if affiant, or anyone on his, her or their behalf obtains further information between the time the answers are served and the time of trial. If more than one plaintiff is named, please answer separately for each plaintiff. If a minor plaintiff is involved, the following Interrogatories, where applicable, are to be answered with reference to the claim of the said minor. Defendants demand answer within thirty (30) days of service as required by the Rules of Civil Procedure.

1. Please provide the current address and telephone number(s) for Tracey Smith.

ANSWER:

**EXHIBIT "B"**

2. If the above information is unknown to you, provide the addresses at which Ms. Smith resided for the last three years.

ANSWER:

3. Kindly provide any information which may assist the Defendant in locating Tracey Smith, including:

- a. Date of birth;
- b. Place of birth;
- c. Social Security Number;
- d. Any other name(s), including, nicknames and aliases by which Tracey Smith has been known; and,
- e. The names, addresses and telephone numbers of any family member or friends who may be able to provide information regarding the present whereabouts of Tracey Smith.

ANSWER:

4. Provide the name(s) and address(es) of any persons or companies who employed Ms. Smith for the last three years.

ANSWER:

5. Kindly provide copies of any documents or records in your possession that support the information provided in response to Interrogatories 1 to 4 above.

ANSWER:

BASHLINE & HUTTON

BY: 

Gerald J. Hutton, Esquire  
Counsel for Defendant,  
Scott's Econo Inn. Inc

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing DEFENDANT SCOTT'S ECONO INN, INC.'S INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO PLAINTIFF was served via U.S. First Class Mail, postage pre-paid, on this 14<sup>th</sup> day of December, 2005, upon the following counsel of record:

A.J Adams, Esquire  
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BASHLINE & HUTTON

By 

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